

Representing Management Exclusively in Workplace Law and Related Litigation



Jackson Lewis P.C.  
666 Third Avenue  
New York, New York 10017  
Tel 212 545-4000  
Fax 212 972-3213  
www.jacksonlewis.com

ALBANY, NY	GREENVILLE, SC	MONMOUTH COUNTY, NJ	RALEIGH, NC
ALBUQUERQUE, NM	HARTFORD, CT	MORRISTOWN, NJ	RAPID CITY, SD
ATLANTA, GA	HONOLULU, HI*	NEW ORLEANS, LA	RICHMOND, VA
AUSTIN, TX	HOUSTON, TX	NEW YORK, NY	SACRAMENTO, CA
BALTIMORE, MD	INDIANAPOLIS, IN	NORFOLK, VA	SALT LAKE CITY, UT
BIRMINGHAM, AL	JACKSONVILLE, FL	OMAHA, NE	SAN DIEGO, CA
BOSTON, MA	KANSAS CITY REGION	ORANGE COUNTY, CA	SAN FRANCISCO, CA
CHICAGO, IL	LAS VEGAS, NV	ORLANDO, FL	SAN JUAN, PR
CINCINNATI, OH	LONG ISLAND, NY	PHILADELPHIA, PA	SEATTLE, WA
CLEVELAND, OH	LOS ANGELES, CA	PHOENIX, AZ	ST. LOUIS, MO
DALLAS, TX	MADISON, WI	PITTSBURGH, PA	TAMPA, FL
DAYTON, OH	MEMPHIS, TN	PORTLAND, OR	WASHINGTON, DC REGION
DENVER, CO	MIAMI, FL	PORTSMOUTH, NH	WHITE PLAINS, NY
DETROIT, MI	MILWAUKEE, WI	PROVIDENCE, RI	
GRAND RAPIDS, MI	MINNEAPOLIS, MN		

\*through an affiliation with Jackson Lewis P.C., a Law Corporation

DIRECT DIAL: (212) 545-4021

EMAIL ADDRESS: JASON.ZOLDESSY@JACKSONLEWIS.COM

August 10, 2020

**VIA ECF**

Honorable Barbara Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: De La Cruz v. Manhattan Parking Group  
et al.  
Case No. 1:20-cv-00977 (JPO) (BCM)**

Dear Judge Moses:

We are counsel for the Defendants in connection with the above-referenced case, and submit this letter jointly with counsel for Plaintiff pursuant to the Court's June 30, 2020 Initial Case Management Order (ECF Docket # 48) and in anticipation of the status conference with the Court scheduled for August 12, 2020 at 11:00 a.m.

As the Court is aware, this lawsuit is a putative class and collective action in which Plaintiff alleges claims pursuant to the Fair Labor Standards Act and New York Labor Law. Since the June 30<sup>th</sup> conference with the Court both sides have served written discovery requests and have conferred about the possibility of settlement. Specifically, the parties have discussed parameters for Defendants to produce a sampling of time and pay records for certain putative class members, which will be used by both sides to value the case for classwide settlement negotiations. Thereafter, the parties intend to schedule a private mediation session, which we anticipate will occur over the course of the next 60 to 90 days.



Hon. Barbara Moses, U.S.M.J.  
United States District Court  
August 10, 2020  
Page 2

The parties look forward to discussing the case with the Court in greater detail during the August 12<sup>th</sup> conference. We thank the Court for its consideration in this regard.

Respectfully submitted,

JACKSON LEWIS P.C.

A handwritten signature in black ink, appearing to read "J. Zoldessy", with a long, sweeping horizontal stroke extending to the right.

Jason A. Zoldessy

cc: All Counsel (Via ECF)